

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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RICHARD BOSSUK,	:	
	:	Case No. 1:21-cv-08273-VSB
Plaintiff,	:	
	:	
-against-	:	
	:	<b>JOINT LETTER</b>
AUGUSTA SPORTSWEAR, INC., <i>et al.</i>	:	
	:	
Defendants.	:	
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Pursuant to this Court’s Order in its memorandum endorsement dated August 10, 2022 (Dkt. #39), the Parties submit the following Joint Letter on behalf of Plaintiff Richard Bossuk (“Plaintiff”), Defendant Augusta Sportswear, Inc. (“Defendant Augusta”), and Defendant Jason Livermore (“Defendant Livermore,” together with Defendant Augusta, the “Defendants”), collectively, the “Parties.”

Status of Discovery: Other than the production of Plaintiff’s tax returns at issue in the current discovery dispute, discovery has been completed. Defendants have retained an expert to provide a report to rebut Plaintiff’s expert pursuant to Fed.R.Civ. 26(a)(2)(D)(ii), but Defendants’ expert requires the Plaintiff’s tax returns to complete his report.

Discovery Disputes: Defendants had previously requested the tax returns of Plaintiff, but Plaintiff objected and did not produce them. Defendants’ rebuttal expert now requires Plaintiff’s tax returns in order to complete his expert rebuttal report on the issue of Plaintiff’s alleged damages. A letter has been filed by Defendants on this issue. Plaintiff filed a response letter.

Post-Discovery Conference: This case has been scheduled for a settlement conference on September 28, 2022. The parties respectfully request that the post-discovery conference be adjourned until after the settlement conference.

Dated: August 19, 2022

/s/ Leah Seliger

D. Maimon Kirschenbaum

Leah Seliger

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